

U.S. patent application no.10/803,255

REMARKS

1. Applicant thanks the Examiner for his findings and conclusions.
2. It should be appreciated that Applicant has elected to amend Claims 1, 4, 12, 20, 29, 36, 40, 50, 56, and 67 solely for the purpose of expediting the patent process in a manner consistent with the PTO's Patent Business Goals, 65 Fed. Reg. 54603 (9/8/00). In making such amendments, Applicant has not and does not in any way narrow the scope of protection to which the Applicant considers the invention herein entitled. Rather, Applicant reserves Applicant's right to pursue such protection at a later point in time and merely seeks to pursue protection for the subject matter presented in this submission.
3. The Applicant amends Claim 56 to properly punctuate the preamble by removing an extra comma according to standard claim drafting practices.
4. Claims 1, 4, 5, 7-15, 21-25, 29, 33, 25-43, 51-53, 56, 60, 62-70, and 76-80 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent application publication no. 2003/0144830 A1 (hereinafter "Williams").

Claim 1

The Applicant amends Claim 1 to clarify the description of the invention by further requiring that the ideographic database comprises indices associated with both stroke sequences and phonetic sequences. Further, the Applicant clarifies that the indices associated with both stroke sequences and phonetic sequences each represent a phrase comprising two or more ideographic characters. Thus, as amended one database contains indices linking both stroke sequences and phonetic sequences with user input. As the inventors point out in the Summary

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of the Invention, by introducing common indices to ideographic characters, the system allows the ideographic characters to be shared among different type of input methods, such as the claimed phonetic and stroke based input, which is important in a memory limited reduced keyboard input system. The Applicant further clarifies, by amendment, that the comparing and converting steps match the input sequence to the displayed output using the indices. Support for the amendment is found in the application as filed at least at page 8, line 19 to page 9, line 3; page 8, lines 15-16; and page 12, lines 18-23. Williams does not teach or suggest a single ideographic database having indices that match both the stroke and phonetic sequences with phrases of two or more ideographic characters. Accordingly, the current rejection of Claim 1 and all claims dependent therefrom under 35 U.S.C. § 102(e) as being anticipated by Williams is deemed to be overcome.

Claim 29

The Applicant amends Claim 29 to clarify the description of invention by further requiring the output device simultaneously displays all of: a text region displaying text entered by the user, a phonetic Pinyin spelling selection list, and a Chinese phrase selection list. Support for the amendment is found in the application as filed at least at page 15, lines 3-18. At best, Williams at paragraph [0007] teaches displaying (1) strokes represented by a series of key presses and (2) likely Chinese characters corresponding to the series of key presses. Williams does not teach or suggest displaying, at the same time that entered text is displayed, both a phonetic Pinyin spelling selection list and a Chinese phrase selection list where each phrase includes two or more ideographic characters. Accordingly, the current rejection of Claim 29 and all claims dependent therefrom under 35 U.S.C. § 102(e) as being anticipated by Williams is deemed to be overcome.

Claim 56

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The Applicant further amends Claim 56 to clarify the description of the invention by further requiring the step of displaying to simultaneously display all of: a text region displaying text entered by the user, a phonetic Pinyin spelling selection list, and a Chinese phrase selection list. Support for the amendment is found in the application as filed at least at page 15, lines 3-18. At best, Williams at paragraph [0007] teaches displaying (1) strokes represented by a series of key presses and (2) likely Chinese characters corresponding to the series of key presses. Williams does not teach or suggest displaying, at the same time that entered text is displayed, both a phonetic Pinyin spelling selection list and a Chinese phrase selection list where each phrase includes two or more ideographic characters. Accordingly, the current rejection of Claim 56 and all claims dependent therefrom under 35 U.S.C. § 102(e) as being anticipated by Williams is deemed to be overcome.

5. Claims 1, 3-5, 7-25, 27, 29, 31, 33, 35-56, 58, 60, and 62-81 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement as containing subject matter that was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor, at the time the application was filed, had possession of the claimed invention.

(i) The Examiner sustains an earlier rejection of Claim 1 for containing the clause "ideographic sequence database". As amended, *supra*, Claim 1 no longer contains the clause "ideographic sequence database". Accordingly, the current rejection of Claim 1 for containing the clause "ideographic sequence database" is deemed to be overcome.

(ii) The Examiner argues that the newly amended Claim 1 limitation of a "phonetic database" introduces new matter. As amended, *supra*, Claim 1 no

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longer contains the clause "phonetic database". Accordingly, the current rejection of Claim 1 for containing the clause "phonetic database" is deemed to be overcome.

(iii) The Examiner rejects Claims 1, 29 and 56 stating that the specification teaches "an input method specific database" and hence the use of the term "database" in Claim 1 has nothing to do with the later claimed "ideographic characters", thus failing to comply with the written description requirement.

Claims 1, 29, and 56

The Applicant respectfully disagrees. The application as filed at page 8, line 19 to page 9, line 3 reads, emphasis added:

In one preferred embodiment, a method for input ideographic characters with a user input device is disclosed. The user input device includes: (1) a plurality of input means, each of which being associated with a plurality of strokes or phonetic characters, an input sequence being generated each time when an input is selected by the user input device; (2) data consisting of a plurality of input sequences and, associated with each input sequence, an input method specific database containing a plurality of input sequences and, associated with each input sequence, a set of phonetic sequences whose spellings correspond to the input sequence or a set of strokes sequences corresponding to the input sequence; and (3) an ideographic database containing a set of ideographic character sequences, wherein each ideographic character contains an ideographic index, a plurality of stroke indices to corresponding stroke sequences and a plurality of phonetic indices to corresponding phonetic sequences.

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Thus, the Examiner is correct in as much as the specification does teach "an input method specific database". However, the specification also teaches "an ideographic database". Further, the specification links the ideographic database to "ideographic characters". Accordingly, the current rejection of Claims 1, 29, and 56 as failing to comply with the written description requirement is deemed to be improper.

Claim 1

Further, in view of the above described amendments to Claim 1, the current rejection of Claim 1 as failing to comply with the written description requirement is deemed to be overcome.

Claims 29 and 56

The Applicant amends Claim 29 to clarify that the "a database" is "an ideographic database". Support for the amendment is found in the application as filed at least in the above cited section of page 8, line 19 to page 9, line 3. Accordingly, the current rejection of Claims 29 and 56 as failing to comply with the written description requirement is deemed to be overcome.

(iv) The Examiner rejects Claims 3-5, 7-25, 27, 31, 33, 35-55, 56, 60, and 62-81 stating that the specification teaches "an input method specific database" and hence the use of the term "database" in Claim 1 has nothing to do with the later claimed 'ideographic characters', thus failing to comply with the written description requirement.

The Applicant amends Claims 12, 40, and 67 to properly conform descendent language with antecedent usage according to standard claim drafting practices.

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The remaining claims of Claims 3-5, 7-25, 27, 31, 33, 35-55, 56, 60, and 62-81 used the term "database" only in the parent claims, addressed *supra*. Accordingly, the current rejection of Claims 3-5, 7-25, 27, 31, 33, 35-55, 56, 60, and 62-81 as failing to comply with the written description requirement is deemed to be overcome.

6. Claims 3, 16, 18-20, 31, 44, 45, 48-50, 58, 71, and 73-75 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of U.S. patent no. 6,822,585 (hereinafter "Ni").

In view of the above described amendments to parent Claims 1, 29, and 56, the current rejection of dependent Claims 3, 16, 18-20, 31, 44, 45, 48-50, 58, 71, and 73-75 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view Ni is rendered moot.

7. Claims 27, 46, 54, and 55 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of U.S. patent no. 5,197,810 (hereinafter "Zhang").

In view of the above described amendments to parent Claims 1 and 29, the current rejection of dependent Claims 27, 46, 54, and 55 under 35 U.S.C. § 103(a) as being unpatentable over Williams in view Zhang is rendered moot.

8. Claims 17, 47, and 72 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of U.S. patent application publication no. US 2003/0017858 A1 (hereinafter "Kraft").

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In view of the above described amendments to parent Claims 1, 29, and 56, the current rejection of dependent Claims 17, 47, and 72 under 35 U.S.C. § 103(a) as being unpatentable over Williams in view Kraft is rendered moot.

9. The Applicant further limits Claim 4 by amending Claim 4 to remove the "optionally" term.

10. The Applicant further limits Claim 12 by amending Claim 12 to remove the "optionally" term and thus to require that a sequence of matching phonetic sequences is automatically generated based on multiple syllable phonetic sequences.

11. The Applicant further limits Claim 20 by amending Claim 20 to require that the linguistic model uses recency of use or repeated use of phonetic sequences by the user or within an application program.

12. The Applicant further limits Claim 36 by amending Claim 36 to require that the linguistic model uses application context of current input sequence entry.

13. The Applicant further limits Claim 50 by amending Claim 50 to require that the linguistic model uses grammar of the surrounding sentence.

14. New Claims 83-87 are added to the application. Support for new Claim 83 is found in the Application as filed at least at page 8, lines 15-16 reading, emphasis added: "the system matches input sequences to input method specific indices[,] such as phonetic or stroke indices" and at page 12, lines 18-23 reading, emphasis added:

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Step 720: Compare the input sequence with input method specific database 520 and find indices to matching strokes entries or phonetic entries and the matching stroke entries or phonetic entries;

In this step, based on the input method selected, the system uses the comparing and matching means 540 to find one or more indices to phonetic entries from the database 520, or one or more indices to stroke entries.

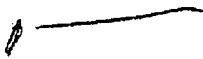
Support for new Claim 84 is found in the application as filed at least at page 17, line 29 to page 18, line 8. Support for new Claim 85 is found in the application as filed at least at page 20, lines 9-10. Support for new Claim 86 is found in the application as filed at least at page 21, lines 12-21. Support for new Claim 87 is found in the application as filed at least at page 22, lines 7-9 and page 21, lines 15-18. Applicant certifies that no new matter was added by way of the new claims.

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CONCLUSION

In view of the foregoing, the Application is deemed to be in allowable condition. As such, the Examiner is earnestly requested to withdraw all rejections, allowing the Application to pass to issue as a U.S. patent. Should the Examiner have any questions regarding the Application, he is respectfully urged to contact the Applicant's attorney at (650) 474-8400.

Respectfully submitted,


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